



November 4, 2011

Helen Hankins, Colorado State Director  
Bureau of Land Management  
Colorado State Office  
2850 Youngfield Street  
Lakewood, Colorado 80215

Keith E. Berger, Field Manager  
BLM Royal Gorge Field Office  
3028 E. Main Street  
Canon City, Colorado 81212

Transmitted by email and by mail

Dear Ms. Hankins and Mr. Berger:

Attached please find the recommendation for the Bureau of Land Management (BLM) State Office and Royal Gorge Field Office to prepare a Master Leasing Plan for BLM lands in Park County managed by the Royal Gorge Field Office, under the terms of IM No. 2010-117. We look forward to working with the BLM in preparation of the "South Park Master Leasing Plan," as you can see from the extensive list of those who support this application (Appendix A). Please contact us if you have questions or would like us to supply additional information or data.

Thank you for this opportunity to present our reasoning for implementing a South Park Master Leasing Plan. We are available to answer questions and to provide assistance.

Sincerely,

John Smeltzer  
Chairman of the Board, President  
cc: Bob Abbey, BLM Director  
US Senators Mark Udall and Michael Bennet  
US Representative Douglas Lamborn

Suzanne O'Neill  
Executive Director

Master Leasing Plan Recommendation for  
South Park, Park County, Colorado

Prepared by  
Colorado Wildlife Federation and supported by the many Signatories to the Letter of Support  
(Appendix A)

The Onshore Oil and Gas Leasing Reforms (Instruction Memorandum No. 2010-117) are intended to bring balance into oil and gas leasing and development programs in Colorado. We are particularly interested in applying the Master Leasing Plan (MLP) tool to South Park, Park County, Colorado. It represents an excellent opportunity to use a landscape scale approach to further leasing of oil and gas resources in this important area before a significant amount of additional acreage is leased. South Park meets the criteria for a MLP and also has other unique circumstances that make it a compelling candidate for an MLP designation.

South Park offers big game, prized fisheries, other wildlife such as waterfowl, beaver, bears, mountain lion, and mountain plover. It includes the communities of Fairplay, Alma, Como, Jefferson, Hartsel and Tarryall.

Below are the BLM's four criteria for the preparation of an MLP and the rationale for submitting this application.

**Criterion 1: A substantial portion of the area to be analyzed in the MLP is not currently leased.**

The proposed MLP area encompasses 524,074 acres. Federal oil and gas mineral ownership comprises 281,741 acres (54 percent of the proposed MLP area). To date, 27,832 acres (10 percent) of the federal mineral estate have been leased. The Instructional Memorandum (IM) does not define the term "substantial" and this small percentage of leased acreage surely cannot be construed as substantial. The status of leasing offers BLM a compelling opportunity to formulate a comprehensive leasing and development plan.

**Criterion 2: There is a majority federal mineral interest.**

The 281,741 acres of federal mineral estate within the proposed MLP occupy 54 percent of the proposed MLP area.

**Criterion 3: The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the area.**

The western area of the Niobrara shale formation extends into South Park, Park County. BLM (Royal Gorge Field Office) intends to offer for lease an additional 11,487.54 acres in South Park at the November 2011 auction. In addition to the 27,832 acres (10 percent) of the federal mineral estate that has been leased, the Colorado State Land Board has leased 36,693 acres of the state mineral estate within the proposed MLP boundary, pursuant to expressions of interest from industry. (The BLM state office approved a unit agreement with El Paso Exploration & Production Company on April 20, 2010 for development and operation of the Bald Hill Unit in

South Park. Kinder Morgan has announced that it will purchase El Paso according to Business Day, October 16, 2011. )

**Criterion 4: Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are: multiple use or natural/cultural resource conflicts; impacts to air quality; impacts on the resources or values of any unit of the national park system, national wildlife refuge, or national forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or impacts on other specially designated areas.**

There are numerous sound policy reasons for master leasing planning.

BLM repeatedly has determined that parcels leased in past auctions and those scheduled for the November 2011 lease auction are suitable for leasing in accordance with the Royal Gorge Resource Management Plan (RMP). The RMP was approved in May 1996, 15 years ago. The RMP was amended in 2009 by the South Park Land Tenure Adjustment Record of Decision. At that time, BLM based its changes in land tenure status on a range of factors: mountain plover habitat, fen and mire wetlands, big game habitat, public access, parcel size, proximity to open space, adjacency to private conservation easements, visual resources, cultural and historic resources, and range economics. However, in the Environmental Assessment for parcels that are proposed for the November 2011 lease sale, BLM states, “The decisions made in the 1996 RMP regarding the availability and suitability of these lands for oil and gas leasing were not amended by the South Park Land Tenure plan. Therefore, the decisions made in the 1996 RMP regarding oil and gas leasing still remain valid at this time.” A decision in 1996 that an area may be authorized for oil and gas leasing should not continue to be determinative during the remaining years before the RMP is due for revision (2013) and completed, particularly without clearly addressing and analyzing the factors identified in 2009 in these same areas.

#### Fish and Wildlife Resources

It is important to recognize the economic contribution that fish and wildlife, other outdoor recreation and tourism in South Park make to the County and to the State. Located within a two-hour drive from the Denver Metro area, recreational use and the accompanying economic contribution to the County and State cannot be underestimated. As hunters, anglers and wildlife watchers, we expect our federal agencies to recognize the importance of wildlife-based recreation to local economies and our Western heritage and traditions. Wildlife-based recreation contributes more than \$17,790,000 annually to the Park County economy (BBC Research & Consulting study - 2007 statistics), an impressive amount for a county with a population of only 16,206 residents (an 11.6 percent population increase since 2000 according to the 2010 Census). The economic impacts of healthy wildlife populations will grow in importance, as well as tourism in general, provided we all act as stewards of the land.

A BLM Master Leasing Planning process will enable a landscape analysis of the high fish and wildlife recreational value of the area, and the potential direct, indirect, and cumulative impacts to fisheries, elk, mule deer, pronghorn, bighorn sheep, mountain plover, and numerous other species. See attached maps in Appendix B (which includes Colorado Oil and Gas Conservation Commission (COGCC) sensitive species and restricted surface occupancy pursuant to its rules).

The cumulative impacts of oil and gas development in South Park have not been defined. We note the BLM's efforts on a parcel by parcel basis to address impact to wildlife, referencing, by way of example, the following lease stipulations incorporated into the parcels scheduled for the November 2011 lease auction (according to the August 8 notice): to "protect big game winter habitat" (4 parcels), to "alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal" (each of the 9 parcels), to "protect mountain plover" (9 parcels), and to "protect raptor nesting and fledgling habitat" (each of the 9 parcels). Lease stipulations imposed parcel by parcel, however, will not suffice to protect the values offered by the federal mineral estate on a landscape level in South Park. For its November 2011 lease auction, BLM concluded in its Environmental Assessment (EA), "At this time, the speculative nature of this process [leasing parcels] does not allow for specifics of development to be known; therefore, impacts to terrestrial wildlife caused by development remain unknown. If a parcel is leased and development occurs, impacts likely to occur will be habitat loss and fragmentation (well pad construction, road construction, etc.)." BLM cites the 2006 study conducted by Hall Sawyer *et al.* in the Mesa south of Pinedale, Wyoming, and concludes that "... indirect habitat loss caused by an avoidance response of mule deer could be reduced by 38-63% with the use of advanced technologies and proper planning that minimize the number of well pads and amount of human activity associated with them." However, in late 2010, Dr. Sawyer presented additional findings from his continued study of this same area, emphasizing that "the 2009 adult female survival rate was less than 70 percent – 10 percent lower than the seven-year average; most of the does were dying in May. 'These deer came off the winter range, made it through most of their migration and just sort of tipped over. We have never seen anything like this before but it certainly raises a flag.'" (Sublette Examiner, November 1, 2010, reporting on Dr. Sawyer's presentation to representatives of BLM, Wyoming Game and Fish and Anticline natural gas operators.)

In this EA, BLM postpones a cumulative impacts analysis into the future, concluding, "Every parcel is unique and cumulative impacts will need to be thoroughly addressed in the APD stage." But, the APD (application for drilling permit) stage offers limited adjustments, and measures are subject to the operator's assessment of technological and economic feasibility. An APD is of limited scope and does not fully address wildlife and recreational issues. Development would require infrastructure, new roads, pipelines and other facilities that will affect wildlife resource and recreation. As BLM already has leased a significant number of acres in the Bald Hill Unit, a Master Leasing Plan presents an excellent opportunity for BLM to conduct an assessment of possible cumulative impacts of fragmentation under a "what if" scenario of development of those leases coupled with potential development of the proposed November leases in this area, and the extensive unleased federal mineral estate.

Note, as a non-game species example, that the federal mineral estate includes substantial mountain plover habitat. BLM should consider the best available science on direct, indirect, and cumulative impacts of leasing and development on the habitat of this BLM (and Colorado Parks and Wildlife) sensitive species. On May 12, 2011, the US Fish and Wildlife Service withdrew its proposed rule to list the mountain plover as a threatened species. In its decision, the agency specifically noted that BLM environmental review standards "may lead to more widespread use of development practices that minimize impacts. It is important that the BLM view its habitat area on a greater than parcel by parcel basis and at this larger level determine appropriate

stipulations to protect the species in advance of additional leasing.” See attached map in Appendix B that shows occurrences of mountain plover. (On the map, the term “element occurrence” represents a continued/recurrent generalized location. The spatial polygon data used in the mapping display, are generalized to 9 square miles to protect this sensitive species.) We all seek to prevent a future listing of this species through strategic considerations and measures.

The headwaters of the South Platte River are located in South Park. Water storage reservoirs including Antero, Tarryall, Spinney Mountain, and Eleven Mile are prized fisheries. Trout waters are known internationally. The section of the South Platte River between Spinney and Elevenmile Reservoirs is a reknowned fishing stretch known as the “Dream Stream.” South Park features the most miles of Gold Medal waters in the state. Gold Medal waters are designated restricted surface occupancy under the COGCC rules. (See attached map in Appendix B, South Park Master Leasing Plan Application Boundary COGCC Wildlife Habitat with Restricted Surface Occupancy.) Wetlands adjacent to the Middle Fork of the South Platte are wildlife habitat and serve as water recharge areas.

Several state parks and state wildlife areas offer excellent public access to the fish and wildlife resources. A cluster of heavily used state parks and wildlife areas are Spinney Mountain State Park, Charlie Meyers (formerly Spinney Mountain) State Wildlife Area (named after the late Denver Post outdoor writer), and Eleven Mile State Park. Additional state wildlife areas are Badger Basin (gold medal waters), James Mark Jones (deer, elk, pronghorn, small game), Knight-Imler (trout), 63 Ranch (trout, big game, waterfowl), Tarryall Reservoir, Teter (coldwater stream, waterfowl, big game), and Tomahawk State Wildlife Area (trout, deer, elk, pronghorn, small game, waterfowl). The newest state wildlife area, Cline Ranch State Wildlife Area, was dedicated in South Park on September 17, 2011. It consists of 1,635 acres of public fishing access to 2.5 miles of the upper Tarryall Creek and hunting opportunity for big and small game and waterfowl. (Colorado Division of Parks and Wildlife press release, September 5, 2011). State Trust lands that offer public access are Agate Mountain (GMU 58), Antero (GMU 49, 50), Badger Flats (GMU 50, 581), Crooked Top (GMU 46), Dick’s Peak ( GMU 58), Eleven Mile (GMU 581), Hartsel (GMU 58), High Creek (GMU 50), McArthur Gulch (GMU 501), Saddle Mountain (GMU 581), 63 Ranch (GMU 50), Three Mile Mountain (GMU 58), Waugh Mountain (GMU 57, 58), and Wormer Gulch (GMU 58).

#### Archeological Importance

We understand that archeological investigation has been completed on some lands within the Bald Hill unit. Unit-wide studies of the area are necessary, as documented prehistoric Indian sites have been found. The extent of such sites is unknown. Each of the 10 leases that will be offered at the November lease auction contains the stipulation to “alert lessee of Class I and II paleontological area inventory requirement” as well as “to protect cultural resources.”

#### South Park National Heritage Area Designation

In 2009, the South Park National Heritage Area designation was approved by the United States Congress and signed by the President. According to Park County, the designation “opens the door” to obtain grants and matching funds “to help Park County preserve its valuable history and natural resources and to help others learn to appreciate our preservation of the past.” It will promote strongly tourism, ranching, and mining. It also has been designated in 2006 as a

Preserve America Community, a national honor awarded by the First Lady to communities that demonstrate strong efforts in preservation, education and tourism programs. Note that none of the 11,969 acres scheduled for the November lease sale is classified by BLM as Visual Resource Management Class II, which would carry an objective “to retain the existing character of the landscape.” In its planning, BLM should take into consideration South Park/Park County’s own planning and work and ensure that the heritage aspects are maintained.

#### Water Quality and Quantity

In addition to the importance of streams and reservoirs for recreation, water quantity and quality are key issues in this area. The upper South Platte watershed has extensive underground aquifers that connect to surface waters through extensive fractures in geological formations. These aquifers are both shallow, being less than 1000 feet, and can extend to depths below 5000 feet. Water contained in these aquifers can migrate through natural geological formations to the surface, which is evidenced by the many springs, wetlands, and aquatic ecosystems that occur throughout South Park. Geothermal springs in the Hartsel area, by way of example, are evidence of migration of water from deep aquifers to the surface. In addition, the shallow aquifers provide the source of well water for many homes throughout South Park, and for water that eventually reaches the Denver Metropolitan area. Water storage reservoirs along the South Platte headwaters are a major water supply source for Denver Water (including Antero, Tarryall, Spinney Mountain, and Eleven Mile).

Oil and gas development has the potential to contaminate the surface and deeper level water aquifers. The COGCC rules do require a limited level of testing and monitoring in a one-mile radius of each well. This testing addresses shallow wells, springs and other sources of surface water. In this area, testing has documented the presence of high levels of radon gas in shallow water wells. There also are naturally occurring levels of radioactivity throughout much of South Park (including dissolved uranium in certain well water supplies) due to the amount of underground uranium deposits. The radioactivity has been documented by past studies of the United States Geological Survey. The 2003 Ground Water Atlas Of Colorado produced by the Colorado Geological Survey, page 190, states: “An item of concern is the high concentration of radon-222 in the South Park formation greater than 6,000 picocuries/liter.” The proposed U.S. Environmental Protection Agency drinking water standard for radon in ground water is 300 picocuries/liter. Other recent studies of wells have provided further documentation of this statement. This high concentration of radon-222 significantly raises the level of analysis that is necessary to prevent additional contamination from oil and gas exploration that utilizes hydraulic fracturing (“fracking”). Unfortunately, there is no requirement for either short or long term monitoring for potential contamination of deeper water aquifers below 1000 feet, especially within the zone of hydraulic fracturing. There likely will be radioactive material in any fracking and well drilling liquid that is brought to the surface. (Disposal processes should be clearly defined.)

In addition, fracking requires a significant volume of water. Water is difficult and expensive to acquire in South Park. Options include purchasing water from local towns, water districts, or privately owned water. In certain situations, water could be pumped directly from streams. The cumulative impact of obtaining water for hundreds of wells likely would be significant, particularly if such water affects stream flows and associated ecosystems, shallow water aquifers,

agriculture, and water used by the population. The required water needed for full level production of the area –at least for the Bald Hill unit – should be defined, coupled with an assessment of cumulative impacts, especially during periods of drought and low flows, to ecosystems, recreation, agriculture and to water use by the population. To our knowledge, neither the BLM nor the oil and gas industry has undertaken such an analysis.

#### Air Quality

Air quality matters to residents in the area: human health, property values and quality of life. Extensive production of oil and gas and construction of a pipeline will result in air quality impacts. Such impacts might be difficult to control in the terrain and arid conditions of the Bald Hill unit.

## APPENDIX A TO APPLICATION, MASTER LEASING PLAN FOR SOUTH PARK

November 4, 2011

Helen Hankins, State Director  
Bureau of Land Management  
2850 Youngfield Street  
Lakewood CO 80215

Keith Berger, Field Manager  
Royal Gorge Field Office  
Bureau of Land Management  
3028 E. Main Street  
Canon City CO 81212

Dear Director Hankins and Field Manager Berger:

As hunters, anglers and wildlife watchers who take pride in Colorado's world-class wildlife populations, we have a special affinity for those areas of Colorado that retain some measure of the wildness and undeveloped landscape of the Rocky Mountain West. That is why we are formally asking the Colorado office of the U.S. Bureau of Land Management (BLM) to make the long-term protection of South Park, Park County, a priority before major energy development changes the face of this special part of the West.

The headwaters of the South Platte River courses through South Park. Its streams and reservoirs are what make popular gold medal streams fishing destinations such as Antero and Spinney Mountain reservoirs possible. The Colorado Division of Parks and Wildlife annually stocks all of these waters with trout that provide fishing recreation for thousands of anglers each year. Anglers have access to dozens of lakes and streams thanks to the leases the state agency has acquired and manages. In addition, the South Platte provides drinking water for approximately 75 percent of Colorado's population, through Denver Water.

South Park also is prime unfragmented big game habitat with an excellent network of State Wildlife Areas. It offers some of the West's best elk hunting along with pronghorn and mule deer. Much of South Park is also prime habitat for mountain plover, a species of concern by the Colorado Division of Parks and Wildlife; South Park supplies 15-20 percent of the known breeding population. As one veteran wildlife manager said: "For someone who loves wildlife, hunting and fishing, you can't find a better place."

But this sparsely populated area that has long been known for ranching, hunting and fishing and other tourism is now being leased for energy development. The oil and gas that's wedged into geologic formations thousands of feet below South Park has prompted interest by industry in leasing. These leases lie in key habitats for deer, pronghorn, elk, trout and mountain plover. In the most basic sense, South Park, one of the West's last landscapes that retains much of its native habitat and hunting and fishing traditions, is at risk.



As Coloradans and Westerners, we understand that energy development should and will occur. We support responsible energy development that is balanced with the needs of native wildlife populations and the important habitats they require for healthy survival. It is for this reason that the undersigned organizations and residents ask BLM to begin an immediate and formal process that will ensure that the needs of wildlife populations are fully factored in before continuing energy leasing, not as an afterthought. The companies now leasing in South Park must be required to engage in a careful process that assures that local landowners, state and federal wildlife managers and land management agencies have the opportunity to participate in planning and make specific recommendations on where, how and when energy exploration, drilling and production occur.

Many of the companies now developing the West's energy resources have shown they have the knowledge and capital to use the best and newest technology to reduce the impacts of energy development. They have made great strides with directional drilling, using closed-loop systems for produced water, drilling multiple wells from a single pad and installing remote devices to reduce the number and frequency of vehicles on the roads leading to well pads.

Yet, even with these remarkable technological breakthroughs, BLM must consider reducing access or even preventing drilling, particularly in habitat critical for big game migration, winter survival and fawning and calving areas. Drilling near riparian areas along South Park's rivers, streams and reservoirs needs to be carefully managed, with appropriate setbacks.

As hunters, anglers and wildlife watchers, we expect our federal agencies to recognize the importance of wildlife-based recreation to local economies and our Western heritage and traditions. Wildlife-based recreation contributes more than \$17,790,000 annually to the Park County economy (BBC Research & Consulting study - 2007 statistics), an impressive amount for a county with a population of only 16,206 residents (an 11.6 percent population increase since 2000 according to the 2010 Census). The economic impacts of healthy wildlife populations will grow in importance, as well as tourism in general, provided we act as stewards of the land.

We can only have both responsible energy development and our abundant wildlife resource if BLM requires companies to examine the cumulative impacts of energy development to our land and wildlife. The appropriate local and state agencies must be actively involved in developing comprehensive development plans, wildlife mitigation plans and other regulatory protections.

If we're to save these last wild places, we need our federal agencies to develop, enact and enforce a regulatory structure that allows energy development without sacrificing what's best about those places we cherish.

Sincerely,

Trout Unlimited and  
Sportsmen for Responsible Energy Development

by Robert Meulengracht, Colorado SFRED Coordinator, Trout Unlimited

Colorado Trout Unlimited  
by David Nickum

Cheyenne Mountain Chapter (CTU)  
by Erik Heikkinen

Tarryhall Fishing Club Board of Directors  
by: Ken Black

Theodore Roosevelt Conservation Partnership  
by Nick Payne, Colorado Field Representative

National Wildlife Federation  
by Michael Saul, Associate Counsel

Colorado Bowhunters Association  
by Ivan James II, Vice Chairman for Legislation

Colorado Back Country Hunters and Anglers  
by John Gale, Co-Chair

The following is a partial list of individuals who support this application:

Eddie Kochman, Garo  
Larry and Doris LeDue  
Sustainable Solutions Solar Energy, Como  
Bob Barford, Alma  
Ken and Mary Black, Jefferson  
David and Marilyn Whitcomb, Jefferson  
Duane and Jeannie Mellinger, Jefferson  
Ramon Castro, Hartsel, and Save Our South Park Water 08  
Susan Stoval, Indian Mountain (Como)  
Tim Higgins, Indian Mountain (Como)  
Bev and Pat Bushaw, Indian Mountain (Como)  
Walt and Diana Heyder, Indian Mountain (Como)  
Glenn and Marcella Haas, Indian Mountain (Como)  
Louise Mark, Indian Mountain (Como)  
Ron and Jackie Vale, Indian Mountain (Como)  
Alex and Amy Husarenko, Indian Mountain (Como)  
Dennis Burke, Indian Mountain (Como)  
Judy and Jerry Cook, Indian Mountain (Como)  
Fred and Cyndi Burdick, Indian Mountain (Como)  
Lou and Carolyn DeCarolus, Indian Mountain (Como)  
Si and Jackie Nelson, Indian Mountain (Como)  
Kelly and Guy Halligan, Indian Mountain (Como)  
Misi and Robert Ballard, Jefferson  
Debra Baxter, Lake George  
Ron and Carol Ducette, Indian Mountain (Como)  
Bob Lake, Indian Mountain (Como)

Amy Steens, Indian Mountain (Como)  
Dan Qualman, Indian Mountain (Como)  
Donna and Ron Bernard, Indian Mountain (Como)  
Christy and Norm Beaulieu, Indian Mountain (Como)  
Trish Hearty, Indian Mountain (Como)  
Dave Blackburn, Indian Mountain (Como)  
Clifford and Theresa Pugh, Jefferson  
John Lee, Indian Mountain (Como)  
Dee and Pete Weaver, Indian Mountain (Como)  
Steve Bennett, Indian Mountain (Como)  
Cathy and Lee Burke, Indian Mountain (Como)  
Tracy and Fernando Arroya, Indian Mountain (Como)  
Stan and Kiki Moore, Indian Mountain (Como)  
Tom and Janet Gibbons, Indian Mountain (Como)  
Scott Kennedy, Indian Mountain (Como)  
Connie Feist, Indian Mountain (Como)  
Pete and Jenna Ambrose, Indian Mountain (Como)  
Martha and Bob Poley, Indian Mountain (Como)  
Judy Krill, Indian Mountain (Como)  
Carl Krill, Indian Mountain (Como)  
Ross McLure, Indian Mountain (Como)  
Ed McQueen, Indian Mountain (Como)  
Denise Hagerman, Indian Mountain (Como)  
Joy Heines, Indian Mountain (Como)  
Rhonda Green, Indian Mountain (Como)  
Kurt Leyendecker, Indian Mountain (Como)  
Tim Rea, Indian Mountain (Como)  
John Porter, Indian Mountain (Como)  
Pat Bygott, Indian Mountain (Como)  
Laura and Steve Tabor, Elkhorn  
Beth Zosh, Indian Mountain (Como)  
Laura McKinley, Indian Mountain (Como)  
Chuck Atkinson, Indian Mountain (Como)  
Tom and Chris Conner, Indian Mountain (Como)  
Frank and Kay Conner, Indian Mountain (Como)  
Jerry and Carol Cooper, Indian Mountain (Como)  
Jim and Rhonda Collins, Indian Mountain (Como)  
Alan DeLowllis, Indian Mountain (Como)  
Alan and Maria Dillsaver, Indian Mountain (Como)  
Jerry Graves, Indian Mountain (Como)  
Eric Eaton, Elkhorn  
Joe and Wendy Martinez, Indian Mountain (Como)  
Tom and Jackie Odle, Indian Mountain (Como)  
Loren Klain, Indian Mountain (Como)  
Joy and Gary Minke, Indian Mountain (Como)  
Forest and Midge Wheeler, Indian Mountain (Como)

Bonnie and Glenn Banks, Indian Mountain (Como)  
Joe and Joann Furay, Indian Mountain (Como)  
Cliff and Marcella High, Indian Mountain (Como)  
Gregg and Gwen Ippen, Indian Mountain (Como)  
John and Bev Owens, Indian Mountain (Como)  
Gary Emig, Indian Mountain (Como)  
Jill and Craig Campbell, Indian Mountain (Como)  
Jim Stockdill, Indian Mountain (Como)  
John Corneyl, Indian Mountain (Como)  
Beth and Henry Biscardi, Indian Mountain (Como)  
Bob and Joyce Huntington, Indian Mountain (Como)  
Jenn Weese, Indian Mountain (Como)  
Pat Kenkel, Indian Mountain (Como)  
Roger and Donna Mattson, Indian Mountain (Como)  
Chip Sparrow, Indian Mountain (Como)  
Floyd and Chris Trujillo, Indian Mountain (Como)  
Steve O'Neil, Indian Mountain (Como)  
John Henry, Indian Mountain (Como)  
Irene Schmidt, Buffalo  
Robert Holcomb, Buffalo  
Bruno Huber, Elkhorn  
Sherri Foss, Elkhorn  
Art and Dottie Burnham, Elkhorn  
Barb Wacker, Indian Mountain (Como)  
Dan Zebarth, Indian Mountain (Como)  
Gary Zanetti, Indian Mountain (Como)  
Alan and Mary Hinson, Stage Stop  
Steve Perry, Stage Stop  
Brian Letzin, Stage Stop  
Wells Tonjes, Stage Stop  
Bill and Wendy Dow, Stage Stop  
Tim List, Fairplay  
Dave and Kathy Wilson, Fairplay  
Julie and Steve Peditt, Fairplay  
Eric and Jennifer Witzak, Fairplay  
Roy Jackson, Fairplay  
Pete and Claudia Warner, Fairplay  
Art Anderson, Fairplay  
Tony Todd, Fairplay  
Claudia Lee, Indian Mountain (Como)  
Rich and Phyllis Reindel, Indian Mountain (Como)  
Samantha and Larry Bertin, Indian Mountain (Como)  
Beth and Walter Olsen, Indian Mountain (Como)  
Susan Bigham, Indian Mountain (Como)  
Glen Lampton, Indian Mountain (Como)  
Mark and Camille Jochimsen, Indian Mountain (Como)

Dave and Donna Lichtenstein, Indian Mountain (Como)  
Jed Caswall and Pat Martin, Lost Park Ranch  
Angie Johnson, Indian Mountain (Como)  
Dan and Becky Tennison, Indian Mountain (Como)  
Karen and Dave Pederson, Indian Mountain (Como)  
Leon Lux, Fairplay  
Mike and Bernie O'Donnell, Indian Mountain (Como)  
Steve and Cyndi O'Neil, Indian Mountain (Como)  
Howard and Jeanette Binkley, Lost Park Ranch, Jefferson  
AMA Electric, Austin and Michele Adams, Santa Maria Ranch (Como)  
Robert Troyer LLC, Santa Maria Ranch (Como)  
Jerry Gadbois, Santa Maria Ranch (Como)  
Linda DeMoss, Logan Hill (Hartsel)  
Dennis and Heidi Hopkins, Logan Hill (Hartsel)  
Kirsten Springer, Gladhest Farm  
Gary Adler, Fairplay area  
Carol and Raymond Dunn, Canon City (South Park property owner)  
Susan Moore, Hartsel  
Sheila Canfield-Jones, Bailey  
Lynda James, Bailey  
James Lockhart, Colorado Springs  
John Stansfield, Central Colorado Wilderness Coalition, Monument  
Jean Smith, Associate Director, Wild Connections, Colorado Springs  
Ann Akers-Lewis, El Paso County  
Susan Pyne and Christopher Hardesty, Lost Park Ranch, Jefferson

## APPENDIX B

The following maps are attached in Appendix B:

- South Park Master Leasing Plan Application Boundary Surface Ownership (and federal mineral ownership)
- South Park Master Leasing Plan Application Boundary COGCC Sensitive Wildlife Habitat
- South Park Master Leasing Plan Application Boundary COGCC Wildlife Habitat with Restricted Surface Occupancy
- South Park Master Leasing Plan Application Boundary – CO Natural Heritage Program L3 Element Occurrences of Mountain Plover  
(Level 3 data set uses an “element occurrence” file format for mapping display, which represents a continued/recurrent generalized location. The spatial polygon data, when mapped, are generalized to 9 square miles to protect this sensitive species.)